

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

Submitted by: = Northern Telephone & Data (NTD)
Contact = Deanne Miller
Telephone Number: (920)-426-9192
e-mail: info@ntd.net

Subject Matter Expert (SME): Diane Burke
Telephone Number: (920)-426-9192
e-mail: dburke@ntd.net

Authorized Representative: William Miller
Telephone Number: (920)-426-9192
e-mail: wmiller@ntd.net

Name: Application of Granted Credits

Brief Description: SBC will grant claims and it will take over 90 days to appear on NTD's invoices.

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first in January 2002 when NTD first started issuing dispute claims.

2. **How many occurrences and approximately over how long a period of time?**
This occurs each month and has since NTD started disputing claims.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, they don't see this as a problem.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?**
High priority.
7. **Any other pertinent information?** Once claims are granted, they go off the dispute list. If credits are not received for 90 days, this dollar amount is considered owed.

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team .
2. **Was this issue escalated for dispute resolution? If so, when and in what forum? Last known position of the opposing carrier.** SBC does not see this as a problem.
3. **Were any bill adjustments made to resolve this issue?** NO
4. **Were any policies or procedures changed to address this issue? If so, what changes were made?** NO

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible

letter(s).

7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

E-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

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Name: Double billed for Lines
Brief Description: SBC bills the same line twice on the invoice.

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in February, 2002. We discussed this problem with SBC in February, 2002 and submitted our first claim on March 27, 2002.
2. **How many occurrences and approximately over how long a period of time?**

NTD has experienced over 50 occurrences of this problem. This problem has been occurring on our UNE-P bills regularly.

3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, this problem is the result of representative's error and the lack of controls to avoid these errors.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?**

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. In fact, SBC has granted all of our claims regarding this problem, but SBC had not prevented the problem from recurring.
3. **Last known position of the opposing carrier.** SBC claims that this problem should be addressed by improving training of SBC personnel.
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** SBC has stated that they are attempting to improve the training of their representatives.

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue
<ol style="list-style-type: none">1. Your belief as to the cause of the problem.2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.3. What performance measures can be implemented to monitor the desired system operation?4. Any other pertinent information?
B. Prior Attempts to Resolve the Issue
<ol style="list-style-type: none">1. Last known position of the submitting carrier.2. Were any bill adjustments made to resolve this issue?3. How were the adjustments communicated to the submitting carrier? Please

attach any relevant accessible letter(s).

4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

E-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

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Name: Incorrect rates on contracted resale circuits.

Brief Description: When ordering a resale circuit, NTD must first submit a contract to SBC's contract department. This includes the circuit description, price and term plan. We are given a contract ID number which must be submitted on our order. SBC is not giving us the rates on our signed contract.

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in June, 2002.

We submitted our first claim on June 6, 2002.

2. **How many occurrences and approximately over how long a period of time?**
We have 10 circuits on our resale bill. All were charged the incorrect rate. We continue to be billed wrong.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, this problem is the result of representative's error and the lack of controls to avoid these errors. It is also because the correct rates are not being loaded into SBC's system.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?**
High priority.
7. **Any other pertinent information?** SBC credited NTD for three circuits, however, the pricing was never corrected. We continued to be billed the wrong rates.

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. In fact, SBC has granted several of our claims regarding this problem, but SBC had not corrected the problem.
3. **Last known position of the opposing carrier.** SBC suggested that we submit new claims on all circuits that are not getting the correct rate and our account manager would make sure that the correct rates were built into the tables.
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** SBC has stated that they are attempting to improve the training of their representatives.

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?

4. Any other pertinent information?
B. Prior Attempts to Resolve the Issue
<ol style="list-style-type: none"> 1. Last known position of the submitting carrier. 2. Were any bill adjustments made to resolve this issue? 3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). 4. Identify any other carrier(s) known to have experienced similar problems. 5. Did you identify any other problems arising from or related to this issue? 6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). 7. Were any policies or procedures changed to address this issue? If so, what changes were made?
Submitted by: <i>(Name of Carrier)</i>
Contact <i>[Name of Carrier Representative]</i> Telephone Number: <i>(NPA)-NXX-XXXX</i> E-mail:
Subject Matter Expert (SME): <i>(Name)</i> Telephone Number: <i>(NPA)-NXX-XXXX</i> e-mail:
Authorized Representative: <i>(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)</i> Telephone Number: <i>(NPA)-NXX-XXXX</i> e-mail:

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Authorized Representative: William Miller
Telephone Number: (920)-426-9192
e-mail: wmiller@ntd.net

Name: Quantifying of Disputes

Brief Description: Disputes that are denied and than re-opened or escalated, are not quantified in the dispute dollars open by NTD.

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in June, 2002. Our claim amount has never matched what SBC shows.
2. **How many occurrences and approximately over how long a period of time?** This occurs each month and has since NTD started disputing claims.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, they don't see this as a problem.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?** 90 percent of denied claims get escalated. This is a huge amount of dollars that is not being counted.

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team .
2. **Was this issue escalated for dispute resolution? If so, when and in what forum? Last known position of the opposing carrier.** SBC does not see this as a problem.
3. **Were any bill adjustments made to resolve this issue?** NO
4. **Were any policies or procedures changed to address this issue? If so, what changes were made?** NO

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue
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B. Prior Attempts to Resolve the Issue
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4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

E-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

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Name: Changing of PONS

Brief Description: NTD submits an order with a PON (Purchase Order Number). SBC changes these PONs in numerous ways. One example of such a change is identifying PONs as CABSDAILY. The changes in PONs make it impossible to track and verify orders. All PONs are changed on our Facilities invoice.

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in February,

2002. We discussed this problem with SBC in February, 2002 and submitted our first claim on March 7, 2002.

2. **How many occurrences and approximately over how long a period of time?** NTD has experienced over 100 occurrences of this problem. This problem occurs on every Facilities bill and has been occurring on our UNE-P bills regularly.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, this problem is the result of representative's error and the lack of controls to avoid these errors.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?** It is nearly impossible to audit our Facilities bill because of this problem. The audit has been made unnecessarily difficult by SBC's actions.

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. In fact, SBC has granted several of our claims regarding this problem, but SBC had not prevented the problem from recurring.
3. **Last known position of the opposing carrier.** SBC claims that this problem should be addressed by improving training of SBC personnel.
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** SBC has stated that they are attempting to improve the training of their representatives.

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?

4. Any other pertinent information?
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Authorized Representative: William Miller

Telephone Number: (920)-426-9192

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Name: Escalation Process of Disputes

Brief Description: Disputes that are denied for a reason that NTD considers unjust are escalated. The process calls for these to go to the LCS Billing Manager. These claims have taken months to get responses on. Some escalations are directed to our account manger.

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first in January 2002 when NTD first started issuing dispute claims.
2. **How many occurrences and approximately over how long a period of time?** This occurs each month and has since NTD started disputing claims.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, they don't see this as a problem.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?** 90 percent of denied claims get escalated. This is a huge amount of dollars.

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team .
2. **Was this issue escalated for dispute resolution? If so, when and in what forum? Last known position of the opposing carrier.** SBC does not see this as a problem.
3. **Were any bill adjustments made to resolve this issue?** NO
4. **Were any policies or procedures changed to address this issue? If so, what changes were made?** NO

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

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e-mail: dburke@ntd.net

Authorized Representative: William Miller
Telephone Number: (920)-426-9192
e-mail: wmiller@ntd.net

Name: Installation Charges
Brief Description: SBC is improperly assessing a \$40.10 install charge on lines that are being assumed. These lines should not be subject to an install charges.

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in January 2002. NTD submitted its first claim on this issue on January 30, 2002, regarding problems on June 2001 invoices.

2. **How many occurrences and approximately over how long a period of time?**
There have been over 150 occurrences of this problem. This problem has been occurring since June 2001.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based upon our experience and discussions with SBC, this problem seems to be caused by fall out to a manual process, improperly trained SBC personnel, and lack of controls over SBC's manual process.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** No
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?**
High priority.
7. **Any other pertinent information?**

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes, this has been addressed in 3 meeting with SBC and NTD's account team and also discussed with the PUC.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? SBC grants the claims, however, they don't fix the problem.
3. Last known position of the opposing carrier. Training issue.
4. Were any bill adjustments made to resolve this issue? Yes, disputes were entered by NTD and granted by SBC.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? SBC stated that they re-trained their reps.

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please

attach any relevant accessible letter(s).

4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: = Northern Telephone & Data (NTD)

Contact = Deanne Miller

Telephone Number: (920)-426-9192

e-mail: info@ntd.net

Subject Matter Expert (SME): Diane Burke

Telephone Number: (920)-426-9192

e-mail: dburke@ntd.net

Authorized Representative: William Miller

Telephone Number: (920)-426-9192

e-mail: wmiller@ntd.net

Name: Converting single order to multiple orders.

Brief Description: NTD submits an order to SBC. SBC will break the order up into two or three different orders and charge NTD an order processing charge for each order.

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in July, 2002 and submitted out first claim on July 24, 2002.
2. **How many occurrences and approximately over how long a period of time?** NTD has experienced over 50 occurrences of this problem. This problem has been occurring on our UNE-P bills regularly since it was discovered.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, this problem is the result of representative's error and the lack of controls to avoid these errors.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?**

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. In fact, SBC has granted all of our claims regarding this problem, but SBC had not prevented the problem from recurring.
3. **Last known position of the opposing carrier.** SBC claims that this problem should be addressed by improving training of SBC personnel.
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** SBC has stated that they are attempting to improve the training of their representatives.

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

E-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Investigation into the Wholesale Billing Practices of
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Submitted by: = Northern Telephone & Data (NTD)
Contact = Deanne Miller
Telephone Number: (920)-426-9192
e-mail: info@ntd.net

Subject Matter Expert (SME): Diane Burke
Telephone Number: (920)-426-9192
e-mail: dburke@ntd.net

Authorized Representative: William Miller
Telephone Number: (920)-426-9192
e-mail: wmiller@ntd.net

Name: Backbilling for services.

Brief Description: NTD has been billed for services that are any where from six months to over one year old. When we ask for an explanation of these charges, we are given none. When we dispute these charges, asking for specific details, the claims are denied. This happens with credits also.

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in October,

2002. We submitted our first claim on 10/9/2002.

2. **How many occurrences and approximately over how long a period of time?** NTD has experienced over 5 claims since October 2002.
3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Poor auditing and billing practices.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?** Our July 2003 invoice contained a credit. When NTD asked for the details regarding these credits, we were told it is impossible to get.

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. In fact, SBC has granted several of our claims regarding this problem, but SBC had not prevented the problem from recurring.
3. **Last known position of the opposing carrier.** Unknown
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** Unknown

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.

5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

E-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

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Submitted by: = Northern Telephone & Data (NTD)
Contact = Deanne Miller
Telephone Number: (920)-426-9192
e-mail: info@ntd.net

Subject Matter Expert (SME): Diane Burke
Telephone Number: (920)-426-9192
e-mail: dburke@ntd.net

Authorized Representative: William Miller
Telephone Number: (920)-426-9192
e-mail: wmiller@ntd.net

Name: Not getting correct interconnection rates
Brief Description: NTD has not gotten the correct trip charge rate on our facilities invoice, even though it was brought to SBC's attention over one year ago.

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in June, 2002.
2. **How many occurrences and approximately over how long a period of time?**
NTD has experienced over 100 occurrences of this problem. This problem occurs on

every Facilities bill and had originally occurred on our UNE-P bills.

3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, this problem is the result of tables not being updated.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?** Not one of our facilities bills is correct. We made SBC aware that the charges should be \$51.00, not \$71.00. Each month, NTD must submit a dispute to get the contracted rates. Each month we incur late payment charges on this invoice, even though the invoice has never been correct.

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. In fact, SBC has granted all of our claims regarding this problem, but SBC had not prevented the problem from recurring.
3. **Last known position of the opposing carrier.** SBC claims that this problem should be corrected. It has not to date.
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** Unknown.

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue
<ol style="list-style-type: none">1. Your belief as to the cause of the problem.2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.3. What performance measures can be implemented to monitor the desired system operation?4. Any other pertinent information?
B. Prior Attempts to Resolve the Issue
<ol style="list-style-type: none">1. Last known position of the submitting carrier.2. Were any bill adjustments made to resolve this issue?3. How were the adjustments communicated to the submitting carrier? Please

attach any relevant accessible letter(s).

4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

E-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

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4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: = Northern Telephone & Data (NTD)
Contact = Deanne Miller
Telephone Number: (920)-426-9192
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Subject Matter Expert (SME): Diane Burke
Telephone Number: (920)-426-9192
e-mail: dburke@ntd.net

Authorized Representative: William Miller
Telephone Number: (920)-426-9192
e-mail: wmiller@ntd.net

Name: Toll Charges from SBC
Brief Description: NTD receives toll charges from SBC each month on lines that have someone other than SBC as the PIC.

Please answer the following questions:

1. **When this issue was first discovered?** This issue was first discovered in June, 2002.
We submitted our first claim on June 25, 2002.
2. **How many occurrences and approximately over how long a period of time?**

NTD has experienced over 50 occurrences of this problem. This problem occurs on every resale invoice and has been occurring on our UNE-P bills resently.

3. **Is it a recurring problem?** Yes
4. **Your belief as to the cause of the problem.** Based on our experience and discussions with SBC, this problem is the result of representative's error and the lack of controls to avoid these errors.
5. **Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.** NO
6. **What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?** High priority.
7. **Any other pertinent information?** It has taken until August 2003 for these problems to be addressed, even though we have brought this issue up many times.

Please answer the following questions:

1. **Was this issue raised with the opposing carrier? If so, when and how?** Yes, this issue has been addressed in meetings with SBC and NTD's account team and also discussed with the PSC.
2. **Was this issue escalated for dispute resolution? If so, when and in what forum?** Yes. NTD meet with SBC representatives specifically about this issue in November 2002. After the meeting, NTD was told it would be looked into.
3. **Last known position of the opposing carrier.** SBC admitted to a few errors and told NTD they would be corrected.
4. **Were any bill adjustments made to resolve this issue?** Yes, claims were filed by NTD and granted by SBC.
5. **Were any policies or procedures changed to address this issue? If so, what changes were made?** Unknown.

Put procedures in place to eliminate problem. If necessary, run reports each month to correct mistakes.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please

attach any relevant accessible letter(s).

4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

E-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail: